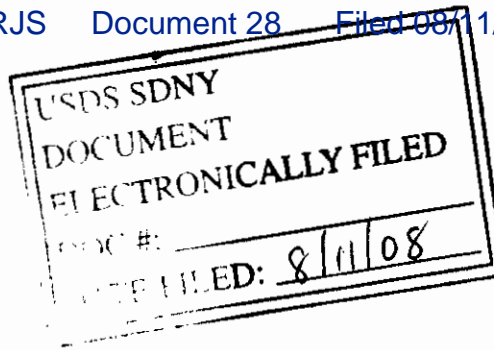


**HARTMAN
CRAVEN** LLP
ATTORNEYS AT LAW



Peter G. Goodman, Partner
Direct Line: (212) 836-4971
pgoodman@hartmancraven.com

August 8, 2008

Via FedEx

Honorable Richard J. Sullivan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 615
New York, NY 10007

MEMO ENDORSED

**Re: National Utility Service, Inc. v.
Tiffany & Co. and Tiffany and Company
Index No.: 07 CV 3345 (RJS)(GWG)**

Dear Judge Sullivan:

We represent plaintiff, National Utility Service, Inc. ("NUS"), in the above action. NUS submits this application for a one week extension of the deadline to file its opposition to defendants' motion for summary judgment and its cross-motion for summary judgment. The deadline is currently September 4, 2008, and NUS requests an extension to September 11, 2008. Because the requested extension affects the briefing schedule set forth in the Court's Order dated June 10, 2008 (the "June 2008 Order"), we have enclosed a proposed Order which sets forth a modified briefing schedule extending each of the remaining filing deadlines by one week.

After the entry of the June 2008 Order we learned that NUS's officials' availability to assist in the preparation of the motion papers is more limited than we initially expected. David Brown, an NUS officer and designated expert on damages, will be on vacation during the last two weeks of August. Richard Soultanian, an NUS co-president and principal, has recently relocated back to the United States from Europe, and is not yet fully engaged in NUS's operations here. The input of these two individuals is critical to NUS's preparation of the summary judgment motion papers. Also, as I pointed out to the Court at the pre-motion conference on June 10, I will be on vacation the last week of August.

We have been advised by Tiffany's counsel that it does not consent to the proposed extension. We submit, however, that the requested one-week adjustments to the briefing schedule are modest and will not prejudice Tiffany. In fact, Tiffany was given six and a half weeks to draft its motion for summary judgment and, with the extension, NUS will have a roughly equivalent period to prepare its papers.

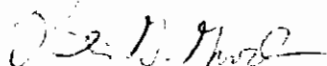
HARTMAN
CRAVEN_{LLP}

August 8, 2008
Page 2 of 2

For all of the above reasons, we request that NUS's application for an extension of the deadline for it to file its opposition to Tiffany's motion for summary judgment and its cross-motion for summary judgment should be granted.

Thank you for your consideration.

Respectfully,


Peter G. Goodman

/enclosure

cc: *Via Facsimile w/enclosure*
Jeffery A. Mitchell, Esq.
E. Timothy McAuliffe, Jr., Esq.

Plaintiff's request is denied. The parties were provided ample time to prepare and file their papers on this matter. Accordingly, an extension such as the one requested here is unwarranted.

SO ORDERED

Date:

8/11/08


RICHARD J. SULLIVAN
U.S.D.J.